

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORY DBP/USPS-230
(May 22, 2000)

The United States Postal Service hereby objects to interrogatory DBP/USPS-230, filed on May 10, 2000. This multi part interrogatory, which purports to follow-up on a response of witness Robinson to a question posed at hearing, is in many ways inappropriate and untimely discovery. First, to the extent that these questions pertain to the subject matter of the question posed at hearing, Mr. Popkin had an opportunity to follow-up at the hearing. By choosing not to participate in hearings, Mr. Popkin has waived his opportunity to pose questions that could have been posed then. Second, each of the questions now posed by witness Popkin could easily have been posed at an earlier stage in the case, and he should not now be permitted to further extend the discovery period on the Postal Service on the pretext of following up on hearing questions. For example, with respect to subparts (a) and (j), which concern information on the relative service standard displayed on the retail terminal, information on this issue was provided as long ago as February 25, in response to DFC/USPS-T34-7(d). While additional information on the retail terminal programing was provided in response to Comm. Goldway's question, Mr. Popkin has had ample opportunity to follow up on any concern that the information on relative service standard on the retail terminals was misleading. With respect to subparts, (b), (d) (e) (f) and (g), which concern zone definitions underlying rates for Priority Mail, Parcel Post and other classes of mail,

information pertaining to this was provided in USPS-T34 Attachment G. If Mr. Popkin were interested in what the zones were he could have asked much earlier. With respect to subpart (c), pertaining to overnight service standards, this issue has been examined earlier in the case. See POIR 6, question 10, filed 4/10/2000, which lists count of ZIP pairs by service standard. If Mr. Popkin wanted further information on specific ZIP pairs that are Local zone with more than overnight service standard he easily could have followed up on this. This question is also objectionable as not relevant to the national rates at issue in this proceeding.

With respect to subpart (i), Mr. Popkin seeks to overturn a prior Postal Service objection to the same question which was sustained. See: POR R2000-1/59 filed 5/10/2000. Mr. Popkin should not be permitted to relitigate this objection.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 22, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


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